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Hearing Date: January 12, 2010 at 10am
Objection Date: January 5, 2010 by 5pm

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Attorneys for United States Fire Insurance Company

**UNITED STATES BANKRUPTCY COURT
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff - Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789-BRL

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

Chapter 7

Case No. 09-11893 (BRL)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that the above-captioned United States Fire Insurance Company (“U.S. Fire”) by and through the undersigned counsel has filed an Motion For Relief From The Automatic Stay To Serve Judicial Subpoena Duces Tecum (the “Motion”) to the Honorable Burton R. Lifland, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York.

PLEASE TAKE FURTHER NOTICE, a hearing on the Motion will be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, in Courtroom 623 located at the United States Bankruptcy Court, One Bowling Green, New York, New York on **January 12, 2010 at 10:00 a.m.** or as soon after as counsel may be heard.

PLEASE TAKE FURTHER NOTICE, that any responses or objections to the Motion, must be in writing, conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court, and be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (General Order M-242 and the User’s Manual for the Electronic Case Filing System (“ECF”) can be found at <http://www.nysb.uscourts.gov/>, the official website for the Bankruptcy Court), by registered users of the Bankruptcy Court’s filing system and, by other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers of Judge Lifland) and shall be served so that they are received no later than **5:00 pm** (prevailing Eastern Time) on **January 5, 2010** upon: (i) United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004; and (ii) Strasburger & Price, LLP, 901 Main Street, Suite 4400, Dallas, TX 75202-3794, Attention: Michael Keeley;

(iii) Olshan Grundman Frome Rosenzweig & Wolosky LLP, Park Avenue Tower, 65 East 55th Street, New York, New York 10022, Attention: Andrea Fischer, Esq.; (iv) Securities Investor Protection Corp., 805 15th Street, N.W., Suite 800, Washington, DC 20005-2207, Attention: Josephine Wang, Esq.; (v) Smith Valliere PLLC, 509 Madison Avenue, Suite 1510, New York, NY 10022-5537, Attention: Mark Warren Smith, Esq.; (vi) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, NY 10111, Attention: Alissa M. Nann, Esq.; (vii) U.S. Attorney's Office, SDNY, 86 Chambers Street, New York, NY 10007, Attention: Robert William Yalen, Esq.; (viii) Brunelle & Hadjikow, PC, 1 Whitehall Street, Suite 1825, New York, New York 10004, Attention: Timothy P. Kebbe, Esq.; (ix) Dickstein Shapiro LLP, 1177 Avenue of the Americas, New York, New York 10036-2714, Attention: Brian Edward Goldberg, Esq.; (x) and Internal Revenue Service, District Director, 290 Broadway, New York, New York 10008, (xi) Internal Revenue Service, Centralized Insolvency Operation, PO Box 21126, Philadelphia, PA 19114; and (xii) Securities Exchange Commission, Northeast Regional, The Woolworth Building, 233 Broadway-John Murray, New York, New York 10279. Only those parties who have timely filed and served an objection to the Motion may be heard at the hearing.

Dated: New York, New York
December 10, 2009

**OLSHAN GRUNDMAN FROME
ROSENZWEIG & WOLOSKY, LLP**

By: /s/ Andrea Fischer

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